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STATE OF MICHIGAN

IN THE CIRCUIT COURT FOR THE COUNTY OF WAYNE

FRANK J. KELLEY, Attorney General
for the State of Michigan, FRANK J.
KELLEY, ex rel MICHIGAN NATURAL
RESOURCES COMMISSION, MICHIGAN
WATER RESOURCES COMMISSION and
HOWARD A. TANNER, Director of
the Michigan Department of
Natural Resources,

Plaintiffs,

v

CHEMICAL RECOVERY SYSTEMS, INC.,
a Michigan Corporation, M.S. & N.
CORPORATION, a Michigan Corporation
NOLWOOD CHEMICAL CORPORATION,
Michigan Corporation, EDWARD W,
LAWRENCE, a Michigan resident,
A.H. MAGNUS, JR., a Michigan
Resident, ARTHUR B. McWOOD, JR.,
a Michigan Resident, CHARLES H.
NOLTON, a Michigan Resident,
and PETER J. SHAGENA, a Michigan
Resident,

Defendants.

Roger A. Schwartz P30010
Assistant Attorney General
Attorney for Plaintiffs

Edward W. Lawrence Pl6464
In Pro Per

Gary J. McInerney Pl7439
Attorney for all Defendants
except Lawrence

Honorable William J. Giovan
Pl4020

Civil Action No.
79-929-190 CE

AFFIDAVIT OF PETER OLLILA

FRANK J. KELLEY
Attorney General

Stewart H. Freeman
Assistant Attorney General
in Charge

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720 Law Building
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NOLWOOD CHEMICAL CORPORATION, a
Michigan Corporation, EDWARD W.
LAWRENCE, a Michigan Resident,
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Resident, ARTHUR B. McWOOD, JR.,
a Michigan Resident, CHARLES H.
NOLTON, a Michigan Resident,
and PETER J. SHAGENA, a Michigan
Resident,

Civil Action No.
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Defendants.

STATE OF MICHIGAN)
) ss
COUNTY OF INGHAM)

AFFIDAVIT OF PETER OLLILA

Peter Ollila, being duly sworn, hereby deposes and says:

1. I am employed by the Michigan Department of Natural
Resources as Water Quality Specialist for the Oil and Hazardous
Materials Control Section, Water Quality Division, Lansing, Michigan.
Through my experience and personal observations I have personal
knowledge of the matters stated herein and if called as a witness
could testify to same.

2. I received a Bachelor of Science degree in Biology from Northern Michigan University, Marquette, Michigan, in 1971. I have taken additional graduate and undergraduate courses in aquatic biology and environmental law, equivalent to two and one-half years of study at Michigan State University, East Lansing, Michigan.

I have been employed by the Michigan Department of Natural Resources since 1971, and have worked in the Oil and Hazardous Materials Control Section of the Water Quality Division since September, 1976. I was employed as a field investigator for the Water Quality Division from September, 1976 to September, 1978.

I have held my present position as Water Quality Specialist for the Oil and Hazardous Materials Control Section since September, 1978. I presently act as unit chief for the Pollution Emergency Alerting System (PEAS). I am also responsible for enforcement of Act 136 of 1969, which regulates the licensing and inspection of liquid industrial waste haulers providing for the control of disposal of wastes.

3. In the course of my employment I have inspected the site of the Chemical Recovery Systems, Inc., plant in Romulus, Michigan, on at least nine (9) separate occasions between September 29, 1976 and June 31, 1978. On many of those occasions I discussed clean up of the site with Mr. Peter J. Shagena, President of Chemical Recovery Systems, Inc.

On many occasions when I discussed the clean up with Mr. Shagena, he responded with threats to close the operation down.

He consistently made statements to the effect that if the Department of Natural Resources required the company to implement an extensive corrective program that they would go out of business resulting in closure of the plant leaving all responsibility for clean up with the State of Michigan.

Mr. Shagena vehemently reaffirmed this position at a meeting which I attended between the company and the Department of Natural Resources in Lansing, Michigan, on August 20, 1979. At this meeting, Mr. Shagena stated that he would personally resort to physical violence against anyone who called Chemical Recovery Systems, Inc. a polluter.

Peter D. Ollila
Peter Ollila

Subscribed and sworn to before me

this 28 day of September 1979

Cheryl A. Abraham

Notary Public, County of Eaton, Michigan
My Commission expires 12-7-82

CHERYL A. ABRAHAM
Notary Public, Eaton County, Mich.
My Commission Expires Dec. 7, 1982